

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JULIO M. HERRERA-VELUTINI,

*Defendant.*

CRIMINAL NO. 22-342  
(SCC)(HRV)

**MOTION TO RESTRICT**

**TO THE HONORABLE COURT:**

COMES NOW the defendant, Julio M. Herrera-Velutini (“Mr. Herrera” or the “Defendant”), through his undersigned attorneys, who respectfully states and prays as follows:

1. Today, Mr. Herrera will file a motion related to a restricted filing (Dkt. 844) and respectfully requests that the Court accept the motion for filing with the following level of restriction: **Ex Parte; Restricted viewing to the Court.**

2. To protect the confidentiality of the matters set forth therein, which involve Mr. Herrera’s right to prepare a defense, it is necessary to file the motion with the requested level of restriction. The protection of the information detailed therein outweighs the presumption of public access.

**WHEREFORE**, Mr. Herrera respectfully requests that the motion remain sealed under the Ex Parte restriction level.

Respectfully submitted in San Juan, Puerto Rico, this 25th day of April, 2025.

**DLA Piper (Puerto Rico) LLC**

/s/ Sonia I. Torres-Pabón

Sonia I. Torres-Pabón (USDC-PR No. 209310)

Email: sonia.torres@us.dlapiper.com

500 Calle de la Tanca, Suite 401

San Juan, Puerto Rico 00901-1969

Telephone: (787) 281-8100

Facsimile: (787) 945-9102

**The LS Law Firm**

/s/ Lilly Ann Sanchez

Lilly Ann Sanchez, Esq. (Fla. Bar No. 195677)

Email: lsanchez@thelsfirm.com

One Biscayne Tower, Suite 2530

2 South Biscayne Blvd.

Miami, Florida 33131

Telephone: (305) 503-5503

Facsimile: (305) 503-6801

**CONTINENTAL, PLLC**

By: /s/ Christopher M. Kise

Christopher M. Kise (FBN 855545)

Admitted ProHacVice

Primary Email: ckise@continentalpllc.com

Secondary Email: cforjet@continentalpllc.com

101 N. Monroe Street., Suite 750

Tallahassee, FL 32301

Telephone: (850) 332-0702

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on this same date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsels of record.

/s/ Sonia I. Torres-Pabón  
Sonia I. Torres-Pabón